

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DEBORAH WELLS,  
Plaintiff,  
v.  
HALLMARK HEALTH SERVICES, INC.  
Defendant.

CASE NO. 04-CV-10164-MEL

ASSENTED-TO MOTION FOR EXTENSION  
OF TIME TO RESPOND TO COMPLAINT

The Defendant, Hallmark Health Services, Inc., hereby moves for a one month extension of the time in which it has to respond to the Plaintiff's Complaint in this matter, up to and including Thursday April 1, 2004. In support of this motion, the Defendant states as follows:

1. The Defendant requires a brief extension of time sought in order to properly investigate the factual and legal issues raised in the Complaint and to prepare an appropriate response thereto.

2. This is the first request for an extension of time filed by the Defendant with regard to the deadline for responding to the Complaint.

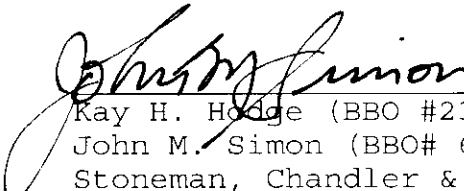
3. Plaintiff's counsel, Richard H. Pettingell, Esq., has been contacted regarding this Motion and has granted his permission to indicate herein that he assents to it.

WHEREFORE, the Defendant respectfully requests that the deadline for filing its response to the Complaint be extended up to and including April 1, 2004.

Respectfully submitted,

HALLMARK HEALTH SERVICES INC.,

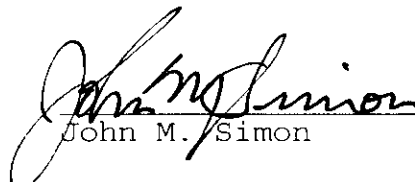
By its attorneys,

  
Ray H. Hodge (BBO #236560)  
John M. Simon (BBO# 645557)  
Stoneman, Chandler & Miller LLP  
99 High Street  
Boston, MA 02110  
(617) 542-6789


Dated: February 24, 2004

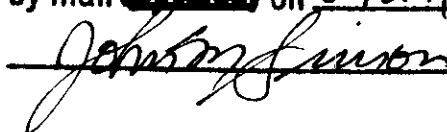
Certification Pursuant to Local Rule 7.1(A)(2)

I hereby certify that, pursuant to Local Rule 7.1(A)(2), I have conferred with Plaintiff's counsel regarding the subject matter of this Motion in a reasonable and good faith attempt to resolve this matter before filing this Motion and that opposing counsel has granted his permission to indicate herein that he assents to this Motion.

  
John M. Simon

Certificate of Service

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail  on 2/24/04.



STONEMAN, CHANDLER & MILLER LLP

99 HIGH STREET  
BOSTON, MASSACHUSETTS 02110

TELEPHONE (617) 542-6789

FACSIMILE (617) 556-8989

ALAN S. MILLER  
ROBERT CHANDLER  
CAROL CHANDLER  
KAY H. HODGE  
ROBERT G. FRASER  
MACON P. MAGEE  
REBECCA L. BRYANT  
GEOFFREY R. BOK  
NANCY N. NEVILS  
JOAN L. STEIN

JOHN M. SIMON  
KATHERINE D. CLARK  
GINA M. YARBROUGH  
JONATHAN R. WERNER  
ANDREA L. BELL

MIRIAM K. FREEDMAN  
OF COUNSEL

February 24, 2004

Civil Clerk's Office  
United States District Court  
One Courthouse Way  
Boston, MA 02210

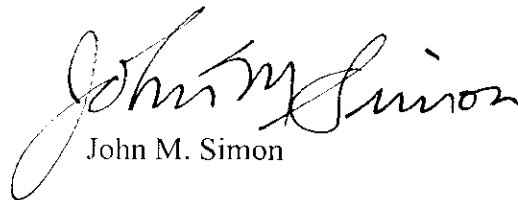
Re: *Deborah Wells v. Hallmark Health Services, Inc.*  
Case No. 04-CV-10164-MEL

Dear Sir or Madam:

Enclosed for filing in the above-captioned matter is Defendant's Assented-to Motion for Extension of Time to Respond to Complaint.

Thank you for your attention to this matter.

Very truly yours,

  
John M. Simon

Enclosure

c: Richard H. Pettingell, Esq.